

C.S., ET AL v. CRAIG MCCRUMB, ET AL

DEPOSITION OF ADAM STROUB

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

C.S. by her Next Friend, ADAM STROUB,
Plaintiff,

v

File No.
2:22-cv-10993-TGB-EAS

HON. TERRENCE G. BERG

CRAIG MCCRUMB, Individually and
in his official capacity as Superintendent
of Durand Area Schools, and AMY LEFFEL,
Individually and in her official capacity
as Principal of Robert Kerr Elementary School,
and MICHAEL PAPANEK, Individually and
in his official capacity as On Track
Coach of Robert Kerr Elementary,

Defendants.

/

DEPOSITION OF ADAM STROUB

Taken by the Defendants on the 1st day of December, 2022,
at 432 North Saginaw Street, Flint, Michigan, at 10:00 a.m.

APPEARANCES:

For the Plaintiff: MR. JOHN R. MONROE
John Monroe Law, PC
156 Robert Jones Road
Dawsonville, Georgia 30534
(678) 362-7650

For the Defendants: MR. DANIEL J. LoBELLO, JR. (P81069)
O'Neill Wallace & Doyle PC
300 Saint Andrews Road, Suite 302
Saginaw, Michigan 48638
(989) 790-0960

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1 Also Present: Craig McCrumb
2 C.S.
3 RECORDED BY: Lori Johnston, CER 15628
4 Certified Electronic Recorder
Network Reporting Corporation
Firm Registration Number 8151
5 1-800-632-2720
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1 Flint, Michigan
2 Thursday, December 1, 2022 - 9:52 a.m.
3 REPORTER: Do you solemnly swear or affirm that
4 the testimony you are about to give will be the whole truth?
5 MR. STROUB: I do.
6 ADAM STROUB
7 having been called by the Defendants and sworn:
8 EXAMINATION
9 BY MR. LoBELLO:
10 Q Can you state your full name for the record, please?
11 A Adam Edward Stroub.
12 MR. LoBELLO: Let the record reflect that this is
13 the date and time scheduled for the deposition of Adam
14 Edward Stroub, being taken pursuant to Notice and to be used
15 for all purposes under the Federal Rules of Civil Procedure
16 and the Federal Rules of Evidence.
17 Q Mr. Stroub, my name is Dan LoBello. I'm here to ask you
18 some questions today about a lawsuit that you filed on
19 behalf of your daughter in connection with an incident that
20 occurred on February 17th of 2022. I take it that you
21 recall that incident?
22 A Yes.
23 Q Have you ever given a deposition before?
24 A No.
25 Q So we just have some court rule -- I'm sorry -- some rules

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1 that are just kind of as a courtesy and mostly for the court
2 reporter's benefit so that when she's all done with our
3 recordings here today, she can type up an accurate
4 transcript. Okay?
5 A Okay.
6 Q One of those rules is that -- and you're doing a good job
7 now -- is to make sure that all of your answers are verbal.
8 It's natural to say "uh-unh" or "uh-huh" or shake your head
9 or whatever the case may be, but she can't take down that
10 stuff so it makes it a little difficult.
11 A Okay.
12 Q The next rule is that if you're answering my question, I'm
13 assuming that you understood my question. But we ask bad
14 questions all the time, I'm sure your counsel might have
15 told you. If you need me to rephrase or repeat something
16 because you don't understand it, I'm happy to do so.
17 Finally, if you need to take a break for whatever reason, I
18 have no problem with you taking a break. I would just ask
19 that if there's a question on the table that you answer the
20 question before we take a break. Okay?
21 A Okay.
22 Q All right. I have your current address as 5851 South Reed
23 Road in Durand, Michigan; is that still accurate?
24 A Correct.
25 Q And who do you live there with?

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2 (Pages 2 to 5)

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1 **A My fiancee and my daughter as well as my parents.**
 2 **Q And what is your fiancee's name?**
 3 **A Jessica Linfield, which is C.S.'s mother.**
 4 **Q Oh, and just for the record's purposes, I spoke with the**
 5 **court reporter before we got started today. Any reference**
 6 **to C.S. that we say as far as her full name is going to be**
 7 **taken down as "C.S." so that her privacy is protected.**
 8 **Okay?**
 9 **A Okay.**
 10 **Q You said it was your parents?**
 11 **A Yes.**
 12 **Q What are your parents' name?**
 13 **A William and Penny.**
 14 **Q Same last name as you?**
 15 **A Yes.**
 16 **Q And can you tell me about your education, starting with high**
 17 **school?**
 18 **A I graduated from high school in '99, then I attended ITT**
 19 **Tech and graduated there in 2008. Got a bachelor's degree**
 20 **in graphic design.**
 21 **Q Any other formal schooling beyond ITT Tech?**
 22 **A No.**
 23 **Q Do you hold any licensing or certifications through the**
 24 **state of Michigan?**
 25 **A CPL. I don't know if that counts.**

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1 **A That was through a doctor in Flint. She had a seizure and**
 2 **that wound us up in the hospital. And then through whatever**
 3 **he seen there, he told us that our daughter was autistic.**
 4 **And it was at that time that we started having her tested**
 5 **and found out that he was right.**
 6 **Q Was any of the testing done through the school to determine**
 7 **her autism diagnosis?**
 8 **A Not that I'm aware of, no. It's all been done through the**
 9 **state.**
 10 **Q How long has she had an IEP?**
 11 **A Since she started school.**
 12 **Q And is there a particular area that she struggles with due**
 13 **to her diagnosis?**
 14 **A Communication.**
 15 **Q Is she verbal, able to speak to communicate?**
 16 **A Yes.**
 17 **Q Okay. Any other manifestations of her disability for what**
 18 **her IEP would cover?**
 19 **A She can get overwhelmed sometimes and it can cause her to**
 20 **cry.**
 21 **Q Have you ever filed a due process complaint with the state**
 22 **of Michigan with reference to your daughter's IEP?**
 23 **A I don't know what that is.**
 24 **Q So I take it that you haven't filed one then?**
 25 **A (No verbal response)**

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1 **Q Are you currently employed?**
 2 **A Self-employed.**
 3 **Q Do you own your own business?**
 4 **A Yeah, technically.**
 5 **Q Is it like a d/b/a or an LLC or incorporated or --**
 6 **A It's sole proprietor.**
 7 **Q And what is the nature of your business?**
 8 **A Exotic pets.**
 9 **Q Do you sell them or --**
 10 **A Yes.**
 11 **Q Okay. Is there any licensing that you need for selling**
 12 **exotic pets?**
 13 **A Not at the amount we do. We don't sell that much yet, we**
 14 **just started.**
 15 **Q Just out of curiosity, what kind of pets are we talking**
 16 **about here?**
 17 **A Reptiles.**
 18 **Q How long as C.S. been enrolled with Durand Area Schools?**
 19 **A All of her school time. So since preschool.**
 20 **Q Does your daughter receive any type of special support**
 21 **services through the school?**
 22 **A She has an IEP because of autism.**
 23 **Q When was she diagnosed with autism?**
 24 **A When she was 2, 3, something right in that area.**
 25 **Q Was that through the school or an independent --**

Page 7

1 **Q And I take it that you're on her IEP team?**
 2 **A Yes.**
 3 **Q Is your fiancee also on --**
 4 **A Yes.**
 5 **Q -- to IEP team? When was the most -- let me ask -- let me**
 6 **back up. Before February 17th of 2022, when was the most**
 7 **recent amendment or IEP meeting for C.S.?**
 8 **A I don't recall.**
 9 **Q Have you ever made any complaints or petitions to the school**
 10 **with reference to your daughter's IEP?**
 11 **A No.**
 12 **Q Have you ever brought to the school's attention that you**
 13 **felt that she was not receiving a free and appropriate**
 14 **public education?**
 15 **A No.**
 16 **Q Have you ever attended a school board meeting since your**
 17 **daughter's been enrolled?**
 18 **A Yes.**
 19 **Q And before the February 17th, 2022 incident, when was the**
 20 **last board meeting that you attended?**
 21 **A I don't recall the exact day.**
 22 **Q Do you know if it was for the 2021/2022 school year?**
 23 **A I know I had been to a few of them, yeah.**
 24 **Q And did you have something to address with the board at that**
 25 **meeting or you were just there to attend?**

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3 (Pages 6 to 9)

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1 **A Just there to attend for the most part, yeah.**

2 **Q You said "for the most part," was there something that you**
3 **addressed with the board at the meeting?**

4 **A They was talking about safety in schools and I was wondering**
5 **about them having an officer at school.**

6 **Q I know that you said you can't recall when you went to the**
7 **last board meeting before this incident that we're here to**
8 **talk about. But at the board meetings that you attended,**
9 **they were before the incident though; is that correct?**

10 **A Yes.**

11 **Q Okay. Did you ever at any of those board meetings challenge**
12 **the dress code or any other portion of the handbook?**

13 **A No.**

14 **Q When your daughter was enrolled in third grade, which is I**
15 **believe the grade that she was in at the time that this**
16 **incident occurred, did you receive a handbook from the**
17 **school?**

18 **A I don't recall for sure. I -- I think we did.**

19 **Q I'm going to show you --**

20 **A But as I recall, it wasn't updated.**

21 **Q And what do you mean by "it wasn't updated"?**

22 **A The -- the new principal's name wasn't on it, I don't think**
23 **if I remember right.**

24 **Q The new principal as of the 2021 school year or the 2022**
25 **school year?**

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Page 12

1 Q Now, leading up to February 17th of 2022 -- if I can find
2 the page.
3 (Deposition Exhibit 2 marked)

4 Q I'm showing you what we'll have marked as Exhibit 2. And
5 I'll represent to you that there's a few pages there, but if
6 we need to refer to them, we'll say "2A, 2B, 2C," that sort
7 of thing. Can you take a look at that document, or the
8 documents that are included as Exhibit 2 for me?

9 (Witness reviews exhibit)

10 A Okay.

11 Q Have you ever seen any of the documents that are depicted in
12 Exhibit 2?

13 A I've seen the first page here, yeah.

14 Q Did you see it before or after February 17th of 2022?

15 A They handed them out, like, numerous times. So I can't be
16 for sure if it's this specific one or another one. But they
17 look pretty much the same from -- from week to week, month
18 to month.

19 Q And when you say "they handed it out," is The RK
20 Locomotion --

21 A Yes.

22 Q -- a newsletter then?

23 A I guess you'd say a newsletter, information from the school,
24 yeah.

25 Q Okay. With regard to this particular, we'll say, edition,

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1 do you recall seeing the edition that's dated February 14th
 2 through 18th, 2022?

3 **A No, not specifically.**

4 Q Do you have any specific recollection of seeing any
 5 indication for an event called a "Great Kindness Challenge"?

6 **A I heard my fiancee speak about it.**

7 Q And when did you hear your fiancee speak about it?

8 **A I can't recall a day.**

9 Q Do you know if it was before or after the February 17th,
 10 2022 event?

11 **A It would have been around that time, but I don't know if it
 12 was before or after.**

13 Q What did she say to you about it, if anything?

14 **A Not much. I just kind heard it when she was talking to C.S.
 15 about it.**

16 Q Did you ever ask about it or make any other inquiry with --

17 **A No.**

18 Q -- your fiancee? Before February 17th, 2022, did your
 19 daughter, to your knowledge, have any type of disciplinary
 20 issues at school?

21 **A No.**

22 Q How are your daughter's grades in terms of your knowledge of
 23 her academics?

24 **A Pretty much a straight A student.**

25 Q Have you ever received any kind of negative report from the

1 daughter ever indicate to you that there were dress-up days
 2 or events going on?

3 **A They held numerous dress-up days throughout the year, yeah.
 4 Pajama day and other stuff.**

5 Q And with regard to Thursday, February 17th, did you give
 6 your daughter anything for that particular dress-up day?

7 **A No.**

8 Q Okay.

9 **A I -- I didn't.**

10 Q Did your fiancee give her anything for the dress-up day?

11 **A C.S. had asked to wear my hat and she allowed her to wear
 12 it, yeah.**

13 Q Is that the same hat you're wearing here today?

14 **A Correct.**

15 Q And that's your hat, that's not C.S.'s hat?

16 **A Yes, it's mine.**

17 Q On February 17th, 2022, were you ever contacted by the
 18 school with regard to your daughter's hat?

19 **A Yes, they called.**

20 Q Do you know what time they called?

21 **A 9:30, 10:00 o'clock.**

22 Q Did you speak with the school or did your fiancee?

23 **A She answered the phone and then passed it off to me and I
 24 spoke with Mr. Papanek.**

25 Q What was your conversation involving?

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Page 16

1 school concerning your daughter or areas where she needs to
 2 improve, that kind of thing?

3 **A No, not negative reports.**

4 Q I know you said that you're self-employed. Do you go to a
 5 location separate from your home to run your exotic pet
 6 business?

7 **A No.**

8 Q Are you generally awake and -- generally awake in the
 9 morning when your daughter gets ready for school?

10 **A Typically, no.**

11 Q Is that because a lot of the business is done at night or --

12 **A Yeah. I -- I do. Because it's hot, I do a lot of cleaning
 13 of racks and stuff at nighttime.**

14 Q So then I take it your fiancee would be responsible for
 15 getting her ready and getting her lunch and making sure that
 16 she's getting to school on time?

17 **A Correct.**

18 Q Does C.S. take a bus or do you take her to school -- I'm
 19 sorry. Does your wife -- fiancee take her to school?

20 **A No. She rides the bus. Well, no, we was taking her to
 21 school for the third grade year, I believe. She didn't
 22 start riding the bus this year -- until this year. So at
 23 the time, we was taking her to school.**

24 Q I know you said you don't recall specifics concerning "The
 25 Great Kindness Challenge." Did your fiancee or your

1 **A That they was displeased with the hat and I -- first I
 2 obviously didn't know what they was talking about, so I just
 3 kind of asked my fiancee what was going on and then she told
 4 me. And then I told her that, you know, she chose to wear
 5 the hat and that she has the right to wear the hat and that
 6 the hat's not hurting anybody. And I think that was about
 7 it, something to that effect.**

8 Q Okay. And was that all the conversation or was there
 9 anything else said?

10 **A I don't remember anything else.**

11 Q Do you remember if they asked if you could bring her a
 12 different hat?

13 **A Yes. They did.**

14 Q And did you bring her a different hat?

15 **A No. That was the hat she picked she wanted to wear.**

16 Q Did she have other hats that she could have worn?

17 **A She did.**

18 Q All right. And did you have any other contact with the
 19 school that day?

20 **A That day, yes. I emailed the principal.
 21 (Deposition Exhibit 3 marked)**

22 Q I have here what we'll mark as Exhibit 3. And I'll
 23 represent to you that these were the answers to our
 24 interrogatories and discovery request that were provided to
 25 us by your counsel. Can you look at those and just make

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5 (Pages 14 to 17)

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1 sure that those are as you understand them the answers that
 2 you provided in connection with those requests?
 3 (Witness reviews exhibit)

4 **A Yeah, it looks correct.**

5 Q Okay. I believe it's on the last two pages, but if you can
 6 take a look at the last two pages, I believe, you may see
 7 some what appear to be emails?

8 **A Okay.**

9 Q And do those appear to be the email communication that you
 10 had with the principal at the time?

11 **A Yes. That is the email that I sent her after C.S. came home
 12 from school.**

13 Q So after you spoke with Mr. Papanek, you did not have any
 14 other email or phone conversation with anyone at the school
 15 until your daughter already got home?

16 **A Correct.**

17 Q And why was it that you contacted them after your daughter
 18 got home?

19 **A Because I asked her if they had made her take her hat off
 20 after having the phone call with Mr. Papanek. And when she
 21 said, "Yes," I emailed them just to confirm that it was,
 22 yup, that they did that.**

23 Q Did your daughter come home with the hat?

24 **A She did.**

25 Q Did she receive any discipline because she wore the hat?

Page 18

1 Q Before your daughter went to school on the date of this
 2 incident, did you happen to review the handbook or do you
 3 know if -- well, did you happen to review the handbook?

4 **A No.**

5 Q Okay. Do you know if your fiancee did?

6 **A No.**

7 Q So if we go back to Exhibit 1, which is the handbook, I
 8 believe you'll find on page 15 there's a passage titled
 9 "Proper clothing." I wonder if you can review that for me
 10 really quick and let me know when you're done?

11 (Witness reviews exhibit)

12 **A Okay.**

13 Q Looking at the passage that you just read, I see a, we'll
 14 say a bullet point or a dash, it says, "Hats, head scarves
 15 are not worn by boys and girls during school hours except
 16 for recess outdoors." Did I read that correctly?

17 **A Correct.**

18 Q So is it your understanding based on reading that passage
 19 that your daughter wouldn't otherwise be able to wear a hat
 20 to school unless it was for recess?

21 **A Or hat day, yeah, in which they encourage the use of hats.**

22 Q And that would be a school event, something sponsored by the
 23 school?

24 **A Correct.**

25 Q If you turn to the next page, which is page 16 of Exhibit 1,

Page 20

1 there's a passage titled "Freedom of expression." Could you
 2 read that for me and let me know when you're done?
 3 (Witness reviews exhibit)

4 **A Okay.**

5 Q So within that passage -- and I'll just read a selection
 6 from it. "All items must meet the following school
 7 guidelines. Material cannot be displayed if it: -- and you
 8 go down to the bottom dash, it says "intends to incite
 9 fighting or presents a likelihood of disrupting school or a
 10 school event or a manner of distribution or display, it
 11 causes or is likely to cause a material or substantial
 12 disruption of school or school activities, a violation of
 13 school regulations, or the commission of an unlawful act."
 14 Did I read that correctly?

15 **A Yes.**

16 Q Looking at that passage and based on what I read, would you
 17 agree that children who wear clothes to school that might
 18 disrupt others' education should be prohibited?

19 MR. MONROE: I'll object to the extent it calls
 20 for a legal conclusion. But answer if you can.

21 **A Okay. Can you repeat the question?**

22 Q Sure. Do you agree that clothing that would otherwise
 23 disrupt another school student's learning or the learning
 24 environment in general should be prohibited in school?

25 **A Yes, I think so.**

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6 (Pages 18 to 21)

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1 Q Okay. And in reading that passage, if the hat in question
 2 that your daughter wore were to disrupt the school in some
 3 way, would you agree that it should be prohibited?
 4 MR. MONROE: Same objection.
 5 A **No, I would not.**
 6 Q And why is that?
 7 A **Because the hat is not disturbing anybody.**
 8 Q And how do you know that?
 9 A **Because a hat can't disturb somebody. I -- I don't know --**
 10 **I don't know how to answer what you're asking.**
 11 Q Well, you said that you don't believe the hat could disturb
 12 anybody, but I'm just wondering how you came to that
 13 conclusion?
 14 A **Because it's a hat.**
 15 Q Going back to I believe we marked it as Exhibit 3, there are
 16 your Answers to Interrogatories. There are some pictures
 17 that are enclosed and it looks like it's the seventh page,
 18 starting there. I'm sorry. Yeah, the seventh page. It's
 19 this (indicating) one, just in case.
 20 (Witness reviews exhibit)
 21 A **Okay.**
 22 Q So these were some pictures -- and it looks like it's page
 23 7, 8, 9, 10, 11, 12, 13, 14, and 17. So it looks like from
 24 seven to 17, there's about 10 pages of photos that were
 25 produced with your Answers to Interrogatories. With regard

Page 22

1 Q There's another photo, page nine, do you know who took that
 2 photo?
 3 A **I'm not sure who took that.**
 4 Q Was it you or your fiancee though?
 5 A **I don't know if it was her. I know it wasn't me because I'm**
 6 **in the picture.**
 7 Q You're the individual standing on what appears to be the
 8 left side of the photo, page nine?
 9 A **Correct.**
 10 Q And where is that photo taken?
 11 A **That was taken in front of the -- I'm drawing a blank. The**
 12 **capital, in Lansing.**
 13 Q Do you know when it was taken?
 14 A **That would have been the year before COVID, so I think '19.**
 15 Q Does the photo depict your daughter?
 16 A **It does.**
 17 Q And what were you guys doing at the capital that day?
 18 A **Second Amendment rights rally.**
 19 Q And is it through a group or a club that you belong to?
 20 A **I'm not sure who put it on.**
 21 Q Okay. Looking at page 10, does that appear to you to be the
 22 same day that are depicted in seven and eight?
 23 A **Yes. That was one day of us being out.**
 24 Q And where is this photo taken?
 25 A **Backyard of our house.**

Page 24

1 to photo number seven, do you know who took that photo?
 2 A **It would have been my fiancee.**
 3 Q And when was it taken?
 4 A **I don't know.**
 5 Q Do you know who your fiancee took the photo? Would you say
 6 a camera or a camera phone or --
 7 A **With her phone, yeah.**
 8 Q Does she still have the same phone with this picture on it?
 9 A **I don't know if the picture's on there anymore, but she does**
 10 **have the phone.**
 11 Q Does it appear to be you and your daughter in the photo?
 12 A **Yes.**
 13 Q And do you have any independent recollection without looking
 14 at, say your wife's phone as to when this might have been
 15 taken, say years or months?
 16 A **No.**
 17 Q Seeing as there's not snow on the ground, would you venture
 18 a guess to say it's --
 19 A **It's summertime, yeah.**
 20 Q Summertime. Okay. And with respect to what's on page
 21 eight, that same photo, do you believe that's from the same
 22 day?
 23 A **Yes.**
 24 Q Also taken by your fiancee?
 25 A **Correct.**

Page 23

1 Q And it appears that your daughter is -- is that an actual
 2 firearm or is that like a BB gun?
 3 A **No. That is a .22.**
 4 Q Okay. Is that your .22 or her .22?
 5 A **That is my father's, her grandfather's .22.**
 6 Q Has your daughter taken any type of hunter safety or firearm
 7 safety courses?
 8 A **No.**
 9 Q Is she enrolled to take any type of firearm safety or hunter
 10 safety courses?
 11 A **Not yet, no.**
 12 Q And I know that you said it's the same day and it's summer.
 13 Was it this summer or was it last summer, summer before
 14 COVID?
 15 A **Either last summer or the summer before, I can't be sure.**
 16 Q And I take it that C.S. does not have actual ownership of
 17 any firearms of her own?
 18 A **No.**
 19 Q Turning to page 12, also on Exhibit 3. Can you tell me
 20 what's in Exhibit 3? I know it's probably at the capital
 21 like the other photo, but is that yourself, your daughter,
 22 and your fiancee?
 23 A **Correct.**
 24 Q And turning to page 16.
 25 A **Okay.**

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7 (Pages 22 to 25)

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1 Q How did you come to receive this photo?
 2 A **It was, I believe, in a newspaper is I think where my**
 3 **fiancee got it.**
 4 Q And does it appear to you that the photo was taken Thursday,
 5 September 17th, 2020?
 6 A **Yeah.**
 7 Q I know you said you weren't sure who put the Second
 8 Amendment rally on at the capital. Do you and your daughter
 9 belong to any other groups that support the Second Amendment
 10 or anything like that?
 11 A **No.**
 12 Q Aside from the meeting at the capital, have you attended any
 13 other Second Amendment support rallies or meetings or
 14 anything like that?
 15 A **We go to the one at the capital every year, with the**
 16 **exception of it being not available due to COVID.**
 17 Q So they hold this rally annually in September?
 18 A **Yes. It's been going on for quite some time. I can't tell**
 19 **you exactly how long.**
 20 Q And do you know did the reporter who's named in the photo in
 21 Exhibit 16 (sic) take all the photos that appeared to depict
 22 either you or your daughter at the capital?
 23 A **I can't tell you if it's the same one or not.**
 24 Q Did you go to the one this year? Or was there one this
 25 year, I should say?

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1 A **No, I wouldn't.**
 2 Q How would someone come to learn then or otherwise be able to
 3 recognize that "Come and take it" was associated with the
 4 right to keep and bear arms?
 5 A **History.**
 6 Q So someone would have to learn history then?
 7 A **Yeah.**
 8 Q And is it all history or a specific area of history?
 9 A **There's numerous days that's noted throughout it.**
 10 Q Okay. Turning to the next paragraph, it looks like there's
 11 a citation to that Battle of Thermopylae in 480 BC. Looking
 12 at paragraph 21, in connection with paragraph 20, would you
 13 come -- or I guess, would you state that someone knowing of
 14 that battle would then know of that statement?
 15 A **I would sure hope so, yes.**
 16 Q And even knowing about, we'll say the Battle of Thermopylae,
 17 how would a person or yourself associate that with the right
 18 to keep and bear arms?
 19 A **I'm not sure how to answer that. Can you repeat that**
 20 **question?**
 21 Q Sure. Looking at that statement and having somebody have
 22 knowledge of the Battle of Thermopylae and the statement
 23 "Come and take them," how would they associate that with the
 24 right to keep and bear arms?
 25 A **It's -- I'm -- I'm pretty sure that's what the battle was**

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1 A **We did.**
 2 Q And did you have any photos from that event?
 3 A **We do.**
 4 Q You took the photos or did somebody else?
 5 A **I took a few and so did my fiancee.**
 6 MR. LoBELLO: Go ahead and mark this as Exhibit 4.
 7 (Deposition Exhibit 4 marked)
 8 Q And I'll represent to you this is a copy of the Complaint
 9 that was filed in this matter. Can you take a look at the
 10 Complaint and let me know when you're finished reading it?
 11 (Witness reviews exhibit)
 12 A **Okay.**
 13 Q Looking at page four, I'm looking at paragraph 20
 14 specifically. And it says, "The words 'Come and take it'
 15 especially when used with the image of a star and some kind
 16 of weapon are a common slogan used to show support for the
 17 right to keep and bear arms." Do you have an idea as to the
 18 source of that statement or where it comes from?
 19 A **Yes. It's -- it's very -- it's a very old statement.**
 20 Q Okay. And how is it common? I mean, I understand it might
 21 be common to you, but how is it common to somebody else?
 22 A **I would not be able to answer for somebody else.**
 23 Q Would you agree that someone would have to have specific
 24 knowledge of that statement and its origin in order to know
 25 its meaning?

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1 **about, about them having their right to bear arms.**
 2 Q But I'm wondering how, in your eyes, somebody would relate
 3 those two things?
 4 A **Relate what two things?**
 5 Q The statement "Come and take them" with the right to keep
 6 and bear arms based on their knowledge of the Battle of
 7 Thermopylae?
 8 A **Because they wasn't willing to lay down their weapons.**
 9 Q Okay. And someone could have a different interpretation of
 10 the purpose of that battle; right?
 11 A **Sure.**
 12 Q And going to paragraph 22, it seems like 22 and 21 are
 13 somewhat connected. You've got the Battle of Thermopylae,
 14 Spartans, Greek, and then you've got a Greek phrase there
 15 "Molon labe"; right?
 16 A **Correct.**
 17 Q Someone not knowing or having any context as far as the
 18 history, do you expect that they would be able to understand
 19 "Molon labe"?"
 20 A **I can't answer for what someone else would understand.**
 21 Q Okay. How about 24? "Used by American Colonel John
 22 McIntosh in November 25th, 1778, was defending Fort Morris,
 23 Georgia against a British attack in response to a British
 24 demand for a surrender of a fort. The British declined to
 25 attempt to do so." Would someone have to know of this

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8 (Pages 26 to 29)

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1 battle in order to associate that battle with the phrase
 2 "Come and take it"?
 3 **A Yes. I would assume so.**
 4 Q And do you believe that it's common for people to be aware
 5 or know of this battle?
 6 **A It's taught in public schools, so I would assume so, I
 7 guess.**
 8 Q Does your daughter have a history book or something that
 9 would cite to this battle?
 10 **A No.**
 11 Q When you say "it's taught in public schools," how do you
 12 know?
 13 **A Because I went to public school.**
 14 Q And it was in your books then?
 15 **A Correct.**
 16 Q And this phrase "Come and take it" was something that was
 17 specifically identified when you were learning about the
 18 battle on November 25th of 1778?
 19 **A I mean, I don't have specific recollection of that, but yes.**
 20 Q 25, it says, "The Texans created the Gonzales flag. But
 21 during the Texas Revolution after Mexico demanded that Texas
 22 return a small cannon that Mexico had previously supplied to
 23 the county of Gonzales for its defense." Now, I take it
 24 you're associated that or you're asserting that to allege
 25 that that's the same white star that appeared on the hat

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1 Q It's on page five of the Complaint.
 2 **A Okay.**
 3 Q It's paragraph 28.
 4 **A I was actually not aware of that, that one's new to me.**
 5 Q Do you have any background in the United States Military?
 6 **A No.**
 7 Q Does your fiancee have any background in the United States
 8 Military?
 9 **A Her father spent the majority of his life in the military.**
 10 Q Her father, is he still living?
 11 **A Yes.**
 12 Q And for the record, he is not the one living with you,
 13 that's your parents, right?
 14 **A Yes; correct.**
 15 Q And what branch of the Armed Forces was he in? I'm sorry.
 16 **A I'm not sure.**
 17 Q What about your father or your mother, were they in the
 18 Armed Forces at all?
 19 **A No.**
 20 Q Okay. In number 29, it says, "C.S. understands the meaning
 21 of the inscription on the hat and the importance of the
 22 inscription to support" -- "to the support of the right to
 23 keep and bear arms." How do you know that your daughter
 24 understands?
 25 **A Because her mother and I have taught her.**

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1 that your daughter wore to school on February 17th, 2022?
 2 **A Yes. The Texas Lone Star.**
 3 Q And looking at the hat and looking at this paragraph, how
 4 would someone recognize that that is the Texas Star, as
 5 opposed to any other star?
 6 **A Because it's tradition with the -- with the single star in
 7 conjunction with any sort of a weapon that it would be
 8 the Texas Lone Star.**
 9 Q And I appreciate that. How would somebody know that?
 10 **A Again, I can't speak for what someone else would know.**
 11 Q Okay. Is it different, say, than the stars that are on the
 12 American flag?
 13 **A Yes.**
 14 Q And how would someone be able to differentiate between the
 15 two?
 16 **A I -- I can't tell you what -- how someone could do that.**
 17 Q Would you agree that somebody would have to have specific
 18 knowledge of this battle or the history behind it in order
 19 to be able to identify that star as opposed to any other
 20 white star that they see?
 21 **A Possibly, yeah.**
 22 Q Number 28, it says, "The words 'Molon labe' are a motto of
 23 the United Special Operations Command Central." How do you
 24 know that?
 25 **A I'm sorry. What page are you on?**

Page 31

1 Q And would you agree that your teaching of her gives her a
 2 specific knowledge as to what the "right to keep and bear
 3 arms" means?
 4 **A Yes.**
 5 Q Would you agree that somebody would have to have a
 6 background or some information about the right and keep and
 7 bear arms in order to be able to identify, say, the Texas
 8 Star or the phrase "Come and take it"?
 9 **A I'm not sure.**
 10 Q Is there anything on the hat that your daughter was wearing
 11 that says that she supports the right to keep and bear arms?
 12 **A Just the -- the hat and the slogan itself would tell most
 13 people that.**
 14 Q And I'll clarify because that was a bad question. Is Second
 15 Amendment or "keep and bear arms" or anything referencing
 16 Article Two of the Constitution on the hat itself?
 17 **A No.**
 18 Q And would you agree with me that people could have
 19 interpretations of the hat?
 20 **A I -- I wouldn't think so, no.**
 21 Q How is that?
 22 **A I mean, it's -- just seems to me like it's common knowledge
 23 what that would mean.**
 24 Q I know it seems to you like it's common knowledge because
 25 you have some history and background it seems. But I'm

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9 (Pages 30 to 33)

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1 saying how is that you know somebody couldn't interpret the
 2 hat differently?
 3 **A I don't.**
 4 Q Looking at paragraphs, we'll say 20 through 28, would you
 5 agree with me that as you've described the phrase "Come and
 6 take it," the Texas Star, the phrase "Molon labe," that
 7 these are statements or representations in general of
 8 battles or war or similar events?
 9 **A Typically, yes.**
 10 Q Okay. And would it be your understanding that war would
 11 typically involve violence?
 12 **A Yes.**
 13 Q And would you agree that the student handbook precludes a
 14 student from wearing banners or insignias that are violent
 15 themes?
 16 **A Yes.**
 17 Q Okay. And is that something you were able gleam just by
 18 reading the handbook that we did today?
 19 **A Yeah.**
 20 Q Would you agree with me that if you were to read the
 21 handbook prior to her wearing the hat and going to school
 22 that day, that you may have found that it might not be in
 23 line with the dress code policy?
 24 **A No.**
 25 Q And how is that?

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1 Q Did you purchase the shirts or does she own the shirts to
 2 wear at a time when she's outside the school?
 3 **A No. We can't afford to wear shirts that she can't wear**
 4 **daily -- or to purchase shirts that she can't wear daily.**
 5 **Sorry.**
 6 Q Does she ever ask to wear, say, your shirt or a sweatshirt?
 7 **A No. My clothes won't fit her.**
 8 Q Aside from the rallies, I know you said that your daughter
 9 doesn't participate in any type of Second Amendment groups,
 10 is there anything else that she does that would indicate to
 11 somebody else that she supports the Second Amendment?
 12 **A Not to somebody else. Her and I do some shooting, as you've**
 13 **seen.**
 14 Q Has she ever written papers on the Second Amendment or --
 15 **A No.**
 16 Q -- any of the historical depictions or cites that you've
 17 made in your Complaint?
 18 **A No.**
 19 Q Has she ever tried to use the Second Amendment as a theme
 20 for an assignment for school?
 21 **A I'm not sure. I don't think so.**
 22 Q The clothing that you said that you didn't purchase for her
 23 because you were worried it wouldn't be approved by school,
 24 can you state specifically what was on the shirt?
 25 **A No, not specifically.**

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1 **A Because I don't see the hat as a violent theme.**
 2 Q And I understand that you don't see the hat as a violent
 3 theme, but based on what the school has said and based on
 4 your understanding, did you seek to clarify that with the
 5 school as to whether your understanding and the school's
 6 understandings matched up?
 7 **A No.**
 8 Q Did your daughter make any statements, aside from selecting
 9 the hat on the day in question, to you except that she
 10 wanted to wear the hat?
 11 **A I was not up when she left for school that morning.**
 12 Q That would be something she would have addressed with your
 13 fiancee?
 14 **A Correct.**
 15 Q And has your daughter tried to wear any other clothing or
 16 insignia that you understand to be her wanting to support
 17 the Second Amendment on any other day?
 18 **A She has asked for -- for stuff, but we generally don't have**
 19 **it because of this.**
 20 Q When you say "she's asked for stuff," what do you mean?
 21 **A She's asked for certain shirts and stuff that we've told her**
 22 **that we don't think that the school would allow it because**
 23 **of what's already happened.**
 24 Q Can you be more specific in terms of "certain shirts"?

25 **A Second Amendment style shirts.**

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1 MR. LoBELLO: I think I'm close to being done. I
 2 just want to confer with my client quickly. And we can take
 3 a short break then we can almost be done.
 4 MR. MONROE: Okay.
 5 (Off the record)
 6 (Deposition Exhibit 5 marked)
 7 Q Mr. Stroub, I'm going to hand you two sheets of paper and
 8 we'll mark these -- I think we're on Exhibit 5. If you
 9 could take a look at those two sheets of paper and let me
 10 know when you're done?
 11 (Witness reviews exhibit)
 12 **A Okay.**
 13 Q Have you ever seen either of the two sheets of paper for the
 14 information contained on Exhibit 5?
 15 **A No.**
 16 Q Since the event involving your daughter on February 17th,
 17 have you attended any board meetings in attempt to make a
 18 change or modify the dress code policy in any way?
 19 **A No.**
 20 Q Do you have any independent knowledge of the school
 21 enforcing the dress code, say, unevenly where your daughter
 22 was not able to wear a hat but somebody else was able to
 23 wear --
 24 **A No.**
 25 MR. LoBELLO: Mr. Stroub, I believe that's all I

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10 (Pages 34 to 37)

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1 have for you. Your counsel may have some questions for you.
2 Thank you very much for your time today.
3 MR. MONROE: I don't have any questions.
4 (Deposition concluded at 10:54 a.m.)

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